

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

-against-

THEODORE ROXFORD a/k/a LAWRENCE  
DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,

Defendants.

-----X

**NOTICE OF DISMISSAL OF COUNSEL  
AND CONSENT TO ENTRY OF DEFAULT JUDGMENT**

WHEREAS,

1. Defendant Hollingsworth, Rothwell & Roxford ("HRR") has no assets; and
2. Theodore Roxford a/k/a Lawrence David Niren, Kenneth Rothwell and Hugh Hollingsworth (collectively, the "HRR Partners") have each been advised of their rights as a corporate defendant in this case by The Roth Law Firm, as well as independent legal counsel, and desire to waive those rights; and
3. The HRR Partners desire to terminate the Roth Law Firm, PLLC as counsel to HRR in this lawsuit; and
4. The HRR Partners desire to permit Plaintiff to enter default judgment against HRR.

**PLEASE TAKE NOTICE THAT,**

1. HRR hereby permits Plaintiff to enter a default judgment against HRR in this lawsuit; and
2. HRR hereby terminates The Roth Law Firm, PLLC as counsel in this lawsuit; and
3. Facsimile signature herein shall be deemed good and sufficient so as to constitute an original signature.

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Theodore Roxford a/k/a Lawrence Niren,  
As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

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Notary Public

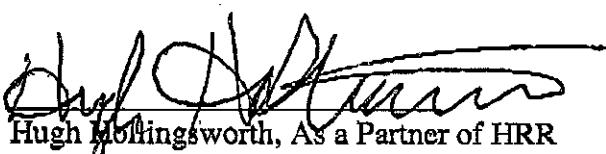
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Kenneth Rothwell, As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

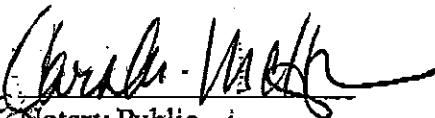
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Notary Public



Hugh Hollingsworth, As a Partner of HRR

Sworn to before me this  
20 day of November, 2007



Carol A. McHugh

NOTARY-PUBLIC-STATE OF FLORIDA  
Carol A. McHugh  
Commission # DD489964  
Expires: NOV. 13, 2009  
Bonded Thru Atlantic Bonding Co., Inc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

-against-

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Defendants.

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3. The HRR Partners desire to terminate the Roth Law Firm, PLLC as counsel to HRR in this lawsuit; and
4. The HRR Partners desire to permit Plaintiff to enter default judgment against HRR.

**PLEASE TAKE NOTICE THAT,**

1. HRR hereby permits Plaintiff to enter a default judgment against HRR in this lawsuit; and
2. HRR hereby terminates The Roth Law Firm, PLLC as counsel in this lawsuit; and
3. Facsimile signature herein shall be deemed good and sufficient so as to constitute an original signature.

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Theodore Roxford a/k/a Lawrence Niren,  
As a Partner of HRR

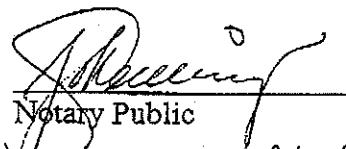
Sworn to before me this  
\_\_\_\_ day of November, 2007

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Notary Public

  
Kenneth Rothwell, As a Partner of HRR

Sworn to before me this  
14th day of November, 2007

  
\_\_\_\_\_  
Notary Public  
My Commission Expires 01-08-08

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Hugh Hollingsworth, As a Partner of HRR

Sworn to before me this  
\_\_\_\_ day of November, 2007

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Notary Public

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No. 07 Civ. 6146

-against-

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DAVID NIREN and HOLLINGSWORTH,  
ROTHWELL & ROXFORD,

Defendants.

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3. The HRR Partners desire to terminate the Roth Law Firm, PLLC as counsel to HRR in this lawsuit; and
4. The HRR Partners desire to permit Plaintiff to enter default judgment against HRR.

**PLEASE TAKE NOTICE THAT:**

1. HCR hereby grants Plaintiff to enter a default judgment against HCR to the amount of \$1,000,000.00.
2. HCR hereby waives The Rule Last Filed Rule as applied to this Judgment.
3. Plaintiff's signature herein shall be deemed good and sufficient so as to constitute an original signature.

  
HARRIS CRONK & REED, LLP  
A Law Firm of HCR

Served to Plaintiff on this  
12 day of November, 2007

  
Karen Kettner

  
Karen Kettner, As a Partner of HCR

Served to Plaintiff on this  
day of November, 2007

  
Hugh Hollingsworth

  
Hugh Hollingsworth, As a Partner of HCR

Served to Plaintiff on this  
day of November, 2007

  
Karen Kettner

101 CANADA

SEPT. 19, 1953

JULY 29, 2005

VALIDITY: MAXIMUM

ENTERED - EXPIRES

UNITED STATES OF AMERICA

JULY 29, 2007

SEE PAGE 24

*Lawrence W. Ladd*

VALIDITY OF THIS CARD IS FOR ONE DUTY PERIOD

NOT VALID UNTIL SIGNED



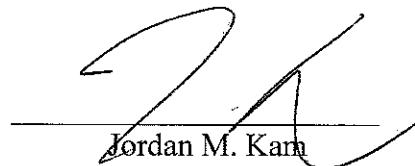
**AFFIRMATION OF SERVICE**

STATE OF NEW YORK )  
                         )ss.:  
COUNTY OF NEW YORK )

JORDAN M. KAM, ESQ., affirms under penalties of perjury:

1. I am over the age of 21 years, am not a party to this action, and reside in New York, New York.
2. On November 20, 2007, I caused the foregoing to be served by electronic mail, on counsel for Plaintiff, Sarah L. Levine, Esq., at the electronic address listed below:

levinesa@sec.gov



Jordan M. Kam